

Mr. Bill Haas
Heckett MultiServ Plant 7
P.O. Box 351
Whiting, IN 46394

Re: Minor Source Modification No:
089-12067-00341

Dear Mr. Haas:

Heckett MultiServ applied for a Part 70 operating permit on October 29, 1996 for a slag and kish separating and conveying operation. An application to modify the source was received on March 21, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction and operation at the source:

- (a) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27, and ID-28, respectively.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Rachel Meredith or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

RLM

cc: File – Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector – Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**Heckett MultiServ
Plant 7
W. End Slag Dump
East Chicago, Indiana 46312803**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 089-12067-00341	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a slag and kish separating and conveying operation.

Responsible Official:	Richard D. Wallace, Jr., Vice President, Operations
Source Address:	W. End Slag Dump, East Chicago, Indiana 46312
Mailing Address:	P.O. Box 351, Whiting, Indiana 46394
Phone Number:	(219) 397-4724
SIC Code:	3295
County Location:	Lake
County Status:	Nonattainment for Ozone, PM10, and SO2 Attainment for CO Unclassifiable for NOx
Source Status:	Part 70 Permit Program Major Source, under PSD Rules 1 of 28 Sources under PSD Rules Major, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27, and ID-28, respectively.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1 Permit No Defense [IC 13]

- ## B.2 Definitions [326 IAC 2-7-1]

B.3 Effective Date of the Permit [IC13-15-5-3]

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]~~[326 IAC 2-7-10.5(i)]~~

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) when operation begins, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP-s shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the responsible official as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternate Opacity Limitations), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this opacity limit shall be achieved by controlling fugitive particulate matter emissions according to the plan submitted on December 7, 1993.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented when operation begins. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this approval until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP-s shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within Anormal® parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in

any quarter.

- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is

operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.

- (d) All record keeping requirements shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the Responsible official® as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27, and ID-28, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Emission Limitation [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2, the particulate matter emissions from the slag crushing operation shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot (dscf)).
- (b) Any change or modification which may increase the potential to emit of PM or PM₁₀ to 25 or 15 tons per year or more from the equipment covered in this minor source modification must be approved by the Office of Air Management (OAM) before such change may occur.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emission unit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Particulate Matter (PM)

Wet suppression for PM control shall be used at all times that the crusher or conveyors are in operation.

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the crusher and conveyor exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition 1.4, the Permittee shall maintain records of visible emission notations of the crusher and conveyor stack exhaust once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Heckett MultiServe – Plant 7
Source Address: W. End Slag Dump, East Chicago, Indiana 46312
Mailing Address: P.O. Box 351, Whiting, Indiana 46394
Source Modification No.: 089-12067-00341

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES ?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF MALFUNCTION=AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Heckett MultiServ PHONE NO. : 219-397-4724
LOCATION: (CITY AND COUNTY) East Chicago, Indiana Lake County

PERMIT NO. 089-12067 AFS PLANT ID: 089-00341 AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 Malfunction[®] definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**Indiana Department of Environmental Management
Office of Air Management**

**Technical Support Document (TSD) for a
Minor Source Modification**

Source Background and Description

Source Name: Heckett MultiServ – Plant 7
Source Location: W. End Slag Dump, East Chicago, Indiana 46312
County: Lake
SIC Code: 3295
Modification No.: 089-12067-00341
Permit Reviewer: Rachel Meredith

The Office of Air Management (OAM) has reviewed an application for a Minor Source Modification to install and operate a new crushing circuit at the existing CM-13 plant. The facility description for the new crushing circuit is as follows:

- (a) One (1) slag crushing circuit having a maximum capacity of 250 tons of slag per hour consisting of one (1) crusher identified as ID-26 and six (6) conveyor transfers identified as ID-22, ID-23, ID-24, ID-25, ID-27, and ID-28, respectively.

Source Definition

This operation consists of a source with on-site contractor:

- (a) LTV Steel Company, the primary operation, is located at 3001 Dickey Road, East Chicago, Indiana; and
- (b) Heckett MultiServ, the supporting operation, is located at W. End Slag Dump, East Chicago, Indiana.

IDEM has determined that LTV Steel Company and Heckett MultiServ are under the common control of LTV Steel Company. These two plants are considered one source due to contractual control. Therefore, the term “source” in the Part 70 documents refers to both LTV Steel Company and Heckett MultiServ as one source.

Separate Part 70 permits will be issued to LTV Steel Company and Heckett MultiServ solely for administrative purposes.

History

On March 21, 2000, an application for the addition of a new crushing circuit was received from Heckett MultiServ. An application for a Part 70 permit (T 089-7066-00341) for the existing source was received from Heckett MultiServ on October 31, 1996, and is currently being reviewed by IDEM, OAM.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete application for the purposes of this review was received on March 21, 2000.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Nonattainment
SO ₂	Nonattainment
Ozone	Severe Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.®

Pollutant	Potential Emissions (tons/year)
PM	24.83
PM-10	11.83
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP-s	Potential Emissions (tons/year)
Total HAPs	0.0

See Appendix A for detailed emissions calculations.

Justification

The potential to emit PM and PM10 from the new crushing circuit is less than 25 tons per year and greater than 5 tons per year. Therefore, this modification is being processed as a Minor Source Modification pursuant to 326 IAC 2-7-10.5(d)(4)(A).

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760

hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM-10	Greater than 100
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NOx	Less than 100

- (1) This existing source is a major stationary source because it is one of the 28 listed source categories and one or more regulated pollutants are emitted at a rate of 100 tons per year or more.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS), 40 CFR 60, applicable to the new crushing circuit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, applicable to the new crushing circuit.

State Rule Applicability

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is one of the twenty eight (28) listed sources under 326 IAC 2-2-1(p)(1), however, the potential to emit from the new crushing circuit is below the threshold established in 326 IAC 2-2-1(w). Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 will not apply.

326 IAC 2-3 (Emission Offset)

The de minimis rule does not apply because emissions from this project do not exceed 15 pounds VOC per day or 25 pounds NOx per day or actual emissions of 25 tons per year of VOC or NOx (326 IAC 2-1.1-3(g)(2)(D) and (E); therefore, the emission offset requirements in 326 IAC 2-3 do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), the visible emissions shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed 60% opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (Particulate Rules Nonattainment Area Limitations)

- (a) The particulate matter emissions from the slag crushing operation shall not exceed 0.07 gram per dry standard cubic meter (g/dscm) (0.03 grain per dry standard cubic foot

(dscf).

- (b) Any change or modification which may increase the potential to emit of PM or PM₁₀ to 25 or 15 tons per year or more from the equipment covered in this minor source modification must be approved by the Office of Air Management (OAM) before such change may occur.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source modification will emit levels of air toxics less than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The construction of the crushing circuit shall be subject to the conditions of the attached proposed **Minor Source Modification No. 089-12067-00341**.

Appendix A: Emission Calculations (PM and PM10)

Company Name: Heckett MultiServ
 Plant Location: East Chicago, Indiana
 County: Lake
 Permit No. 089-12067-00341
 Permit Reviewer: Rachel Meredith

* * PM10 emissions before controls * *

Crushing	ID - 26	250.0 ton/hr x	0.0024 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	2.63 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 22	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 23	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 24	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 25	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 27	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 28	250.0 ton/hr x	0.0014 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	1.53 tons/yr	-42 Ch.11.19.2
Total emissions before controls:						11.83 tons/yr	

* * PM10 emissions after controls * *

Crushing	ID - 26	250.0 ton/hr x	2.00E-03 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	2.19 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 22	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 23	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 24	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 25	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 27	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Conveyor Transfer	ID - 28	250.0 ton/hr x	4.80E-04 lb/ton	/ 2000 lb/ton x	8760 hr/yr =	0.53 tons/yr	-42 Ch.11.19.2
Total emissions before controls:						5.34 tons/yr	

PM = PM10 * 2.1 (AP-42 Table 11.19.2-2 note c)

11.83 * 2.1 **24.83** tons/yr PM Uncontrolled

5.34 * 2.1 **11.22** tons/yr PM Controlled